## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY	) MDL No. 2:18-mn-2873-RMG
LITIGATION	) CASE MANAGEMENT
	ORDER NO. [27-F]
	)
	) This Order Relates to:
	) The Southeast Morris County Municipal
	) Utilities Authority
	) 2:22-cv-00199-RMG and
	) City of Watertown v. 3M Company et al.,
	) 2:21-cv-1104-RMG

## JOINT MOTION FOR ENTRY OF CASE MANAGEMENT ORDER 27-F

The Defense Leadership and Plaintiffs' Executive Committee ("PEC") (collectively, the "Parties") jointly request that the Court enter Proposed CMO 27-F, attached as Exhibit A, which governs the protocol for raising Rule 12(b)(1), 12(b)(2) and/or 12(b)(5) defenses in the two water provider bellwether cases selected for Tier Two Discovery in the Telomer AFFF Bellwether Program, which are (1) *City of Watertown v. 3M Company et al.* (No. 2:21-cv-01104) and (2) *Southeast Morris County Municipal Utilities Authority v. 3M Company et al.* (No. 2:22-cv-00199) (the "Telomer Water Provider Tier Two Cases"). In support of this motion, the Parties state as follows:

- 1. The Parties met and conferred and believe that a Case Management Order governing the protocol for raising Rule 12(b)(1), 12(b)(2) and/or 12(b)(5) defenses in the Telomer Water Provider Tier Two Cases would be beneficial. Thus, the Parties have reached an agreement on the terms of a proposed case management order consistent with the same.
- 2. Accordingly, the Parties now submit proposed Case Management Order 27-F, attached hereto as Exhibit A, for consideration and entry by the Court.

WHEREFORE, the Parties respectfully request that the Court enter proposed Case

Management Order 27-F, attached as Exhibit A.

Respectfully submitted,

## By:/s/ Michael A. London

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